

RECEIVED

JUN 0 6 2007

WA STATE BOARD OF HEALTH

DEPARTMENT OF AGRICULTURE

PO Box 42560 • Olympia, Washington 98504-2560 • http://agr.wa.gov • (360) 902-1800

June 5, 2007

Mr. Ned Therien, Health Policy Analyst Washington State Board of Health PO Box 47990 Olympia, WA 98504-7990

RE: Comments of Proposed Adoption of WAC 246-203-121, Disposal of Dead Animals

Dear Mr. Therien:

The Washington State Department of Agriculture (WSDA) supports the adoption of WAC 246-203-121, *Disposal of Dead Animals*, by the Washington State Board of Health (BOH). The Washington State Department of Ecology (Ecology) and WSDA have worked closely with BOH staff to draft this rule to ensure all agency rules for dead animal management are consistent.

In 2005, at the direction of the Washington State Legislature, Ecology drafted guidelines for composting bovine and equine mortalities. Ecology has confirmed composting to be an effective option for animal mortality management. In 2006, the State Legislature authorized WSDA to create rules for management of livestock carcasses. That rule was adopted by WSDA on May 1 of this year.

The overriding intent of these actions has been to eliminate regulatory conflict and to expand management options to include methods that have been developed since original requirements were created over 40 years ago. WSDA believes adoption of this rule will create consistency among the various rules applicable to animal carcass management.

ecciii diyu

Thank you for the opportunity to offer these comments.

Sincerely,

Leonard Eldridge, DWM

State Veterinarian

Washington State Department of Agriculture

cc: Polly Zhem, Deputy Director, Ecology